

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
 )  
 v. ) CRIMINAL NO. 04-10297-RWZ  
 )  
 NICOLE N. BARTLETT )

MOTION FOR APPOINTMENT OF  
THE FEDERAL DEFENDER OFFICE

Undersigned counsel respectfully requests that the Federal Defender Office be appointed to represent Nicole N. Bartlett in regard to a summons alleging violations of her conditions of supervised release, and for all other matters in connection with any further prosecution of her. As reasons therefore, undersigned counsel states the following:

1. Ms. Bartlett was referred to the Federal Defender Office by her previously retained counsel for advice about the summons issued to her by the U.S. Probation Office. The summons requires her to appear before this Court on October 24, 2007 to answer the allegation that she has violated the terms of her supervised release.
2. Ms. Bartlett has indicated to the undersigned that she wishes to have legal representation in regard to the supervised release violation allegation, and would request that the Court appoint counsel.
3. Ms. Bartlett has executed a financial affidavit that will be separately submitted this day to the Court ex parte under seal. See United States v. Connolly, 321 F.3d 174 (1<sup>st</sup> Cir. 2003).

RESPECTFULLY SUBMITTED,

/s/ Timothy Watkins  
Timothy Watkins  
B.B.O. #567992  
Federal Defender Office  
408 Atlantic Ave., Third Floor  
Boston, MA 02110  
(617) 223-8061

CERTIFICATE OF SERVICE

I, Timothy G. Watkins, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on October 16, 2007.

/s/ Timothy G. Watkins  
Timothy G. Watkins